

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

Civil Action No.: 3:12-CV-519

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

REX VENTURE GROUP, LLC
d/b/a ZEEKREWARDS.COM, and
PAUL R. BURKS,

Defendants.

§
§
§
§
§
§
§
§
§
§
§

**APPLICATION OF MICHAEL J.
QUILLING FOR ADMISSION TO
PRACTICE PRO HAC VICE**

I, Rodney E. Alexander, am a member in good standing of the bar of this Court. Pursuant to the admission requirements in Local Rule 83.1B I am moving for the *pro hac vice* admission of the following attorney:

FULL NAME: Michael J. Quilling

BUSINESS ADDRESS (include firm name):

Quilling, Selander, Lownds, Winslett & Moser, P.C.
2001 Bryan Street, Suite 1800
Dallas, Texas 75201
(214) 871-2100 – Office
(214) 871-2111 – Facsimile
mquilling@qslwm.com

This attorney will be representing Fun Club USA, Inc. and other entities whose assets were seized in connection with the above-referenced matter.

We certify that:

- The proposed admittee is not a member of the North Carolina bar and does not maintain any law office in North Carolina.

- The proposed admittee has never had a *pro hac vice* admission or admission in any other bar revoked.
- The proposed admittee is a member in good standing of the following bars:
 - The State Bar of Texas, (No. 16432300)
 - United States District Court for the Northern District of Texas;
 - United States District Court for the Eastern District of Texas;
 - United States District Court for the Southern District of Texas;
 - United States District Court for the Western District of Texas;
 - United States District Court for the Western District of Michigan;
 - Fifth Circuit Court of Appeals;
 - Seventh Circuit Court of Appeals;
 - Ninth Circuit Court of Appeals;
 - Eleventh Circuit Court of Appeals; and
 - United States Supreme Court.
- The proposed admittee understands admission *pro hac vice* is for this case only and does not constitute formal admission to the bar of this Court.
- The proposed admittee has established or will upon his/her *pro hac vice* admission proceed to immediately establish an ECF account with the Western District of N.C.
- The undersigned movant will serve as co-counsel in these proceedings and will attend all hearings with the proposed admittee unless otherwise permitted by the Court.

- The \$276.00 fee for admission *pro hac vice* is being submitted with the filing of this motion.

Respectfully submitted,

ALEXANDER RICKS PLLC

/s/ Rodney E. Alexander
N.C. Bar Number 23615

2901 Coltsgate Rd., Suite 202
Charlotte, NC 28211

Main: (704) 365-3656
Direct: (704) 365-3614
Fax: (704) 365-3676
E-mail: Rodney@AlexanderRicks.com

ATTORNEYS FOR FUN CLUB USA, INC.

CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2012, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will electronically serve the referenced document on the parties' counsel who are registered CM/ECF users, including:

John J. Bowers
Stephen L. Cohen
J. Lee Buck, II
Brian M. Privor
Alfred C. Tierney
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Noell P. Tin
Tin Fulton Walker & Owen PLLC
301 East Park Avenue
Charlotte, NC 28203

Kenneth D. Bell
McGuire Woods LLP
201 North Tryon Street
P. O. Box 31247
Charlotte, NC 28231

/s/ Rodney E. Alexander
Rodney E. Alexander